

**AMENDMENTS TO THE CLAIMS:**

This listing of claims will replace all prior versions and listings of claims in the application:

1. (Currently Amended) A method, implemented using a computer data processing system, for reducing capital required to be held in connection with a subject pool of loans comprising:

obtaining, as an input to the computer data processing system, a credit risk rating of the loans in the subject pool;

allocating, using the computer data processing system, credit risk for the subject pool among a plurality of parties, based on the credit risk rating and a loss performance of the subject pool in comparison to a reference pool of loans having similar characteristics to the loans in the subject pool;

applying, using the computer data processing system, capital reserve requirements to the subject pool based on the credit risk rating and the credit risk allocated to a party subject to the capital reserve requirements for loans in the subject pool;

calculating, using the computer data processing system, an amount of capital to hold against the subject pool based on application of the capital reserve requirements; and

providing an indication of the amount of capital to hold to the party.

2. (Previously Presented) The method of claim 1, wherein allocating credit risk for the subject pool further comprises:

for the party subject to the capital reserve requirements from the plurality of parties, capping a portion of the credit risk allocated to the party at a maximum level.

3. (Original) The method of claim 2, wherein the maximum level is a percentage of the subject pool value.

4. (Previously Presented) The method of claim 1, wherein allocating credit risk for the subject pool comprises:

assigning a portion of the credit risk for the subject pool to the party subject to the capital reserve requirements; and

assigning a remaining portion of the credit risk to a second party.

5. (Original) The method of claim 4, wherein the credit risk rating includes a plurality of rating categories, and wherein assigning a portion of the credit risk for the subject pool further comprises:

retaining a portion of credit risk on a category by category basis for each of a plurality of rating categories; and

capping the portion of retained credit risk to a maximum level for each of the plurality of rating categories.

6. (Previously Presented) A system for reducing capital required to be held in connection with a subject pool of loans comprising:

means for assisting in obtaining a credit risk rating of the loans in the subject pool;

means for allocating credit risk for the subject pool among a plurality of parties, based on the credit risk rating and a loss performance of the subject pool in comparison to a reference pool of loans having similar characteristics to the loans in the subject pool;

means for applying capital reserve requirements to the subject pool based on the credit risk rating and the credit risk allocated to a party subject to the capital reserve requirements for loans in the subject pool;

means for holding an amount of capital against the subject pool based on application of the capital reserve requirements.

7. (Previously Presented) The system of claim 6, wherein the means for allocating credit risk for the subject pool further comprises:

means for capping a portion of the credit risk to a maximum level for the party subject to the capital reserve requirements from the plurality of parties.

8. (Original) The system of claim 7, wherein the maximum level is a percentage of the subject pool value.

9. (Previously Presented) The system of claim 6, wherein the means for allocating credit risk for the subject pool comprises:

means for assigning a portion of the credit risk for the subject pool to the party subject to the capital reserve requirements; and

means for assigning a remaining portion of the credit risk to a second party.

10. (Original) The system of claim 9, wherein the credit risk rating includes a plurality of rating categories, and wherein the means for assigning a portion of credit risk for the subject pool further comprises:

means for assigning the portion of credit risk on a category by category basis for each of a plurality of rating categories; and

means for capping the portion of assigned credit risk to a maximum level for each of the plurality of rating categories.

11. (Previously Presented) A computer program product, stored on a tangible computer-readable medium, for reducing capital required to be held in connection with a subject pool of loans including code for causing a processor to perform a process comprising:

accessing data regarding a credit risk rating of the loans in the subject pool;

accessing data regarding allocating credit risk for the subject pool among a plurality of parties, based on the credit risk rating and a loss performance of the subject pool in comparison to a reference pool of loans having similar characteristics to the loans in the subject pool;

applying capital reserve requirements to the subject pool based on the credit risk rating and the credit risk allocated to a party subject to the capital reserve requirements for loans in the subject pool;

presenting an indication of the amount of capital held in connection with the subject pool based on application of the capital reserve requirements.

12. (Previously Presented) The product of claim 11, wherein accessing data regarding allocating credit risk for the subject pool further comprises:

for the party subject to the capital reserve requirements from the plurality of parties, accessing data regarding capping the specified party's a portion of the credit risk allocated to the party to a maximum level.

13. (Original) The product of claim 12, wherein the maximum level is a percentage of the subject pool value.

14. (Previously Presented) The product of claim 11, wherein accessing data regarding allocating credit risk for the subject pool comprises:

accessing data regarding assigning a portion of the credit risk for the subject pool to the party subject to the capital reserve requirements; and

accessing data regarding assigning a remaining portion of the credit risk to a second party.

15. (Original) The product of claim 14, wherein the credit risk rating includes a plurality of rating categories, and wherein an assigned portion of the credit risk applies on a category by category basis for each of a plurality of rating categories, and the assigned portion of credit risk is capped to a maximum level for each of the plurality of rating categories.

16. - 27. (Cancelled)

28. (Currently Amended) A method, implemented using a ~~computer data processing~~ system, for reducing capital required to be held in connection with a subject pool of assets comprising:

obtaining, as an input to the ~~computer data processing~~ system, a risk rating of the assets in the subject pool;

retaining, by a party subject to capital reserve requirements for loans in the subject pool among a plurality of parties, a portion of risk for the subject pool, based on the risk rating and a loss performance of the subject pool in comparison to a reference pool of loans having similar characteristics to the loans in the subject pool;

applying, using the ~~computer data processing~~ system, the capital reserve requirements to the subject pool based on the risk rating and the portion of risk retained by the party subject to the capital reserve requirements for loans in the subject pool;

determining, using the ~~computer data processing~~ system, an amount of capital to hold in reserve in connection with the subject pool based on application of the capital reserve requirements; and

presenting the determined amount of capital to the party.

29. (Previously Presented) A system for reducing capital required to be held in connection with a subject pool of assets comprising:

means for obtaining a risk rating of the assets in the subject pool;

means for retaining, by a party subject to capital reserve requirements for loans in the subject pool among a plurality of parties, a portion of risk for the subject pool, based on the risk rating and a loss performance of the subject pool in comparison to a reference pool of loans having similar characteristics to the loans in the subject pool;

means for applying the capital reserve requirements to the subject pool based on the risk rating and the portion of risk retained by the party subject to the capital reserve requirements for loans in the subject pool;

means for determining an amount of capital to hold in reserve in connection with the subject pool based on application of the capital reserve requirements; and

means for presenting the determined amount of capital.

30. - 33. (Cancelled).